



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION  
CITY VIEW PLAZA, SUITE 7000  
#48 165 RD. KM 1.2  
GUAYNABO, PR 00968-8069

JAN 28 2015

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Article Number: 7011 0470 0000 5040 4827**

Noelia Y. Rosa Jaime  
Director  
Environmental Compliance and Planning Office  
Autonomous Municipality of San Juan  
P.O. Box 70179  
San Juan, Puerto Rico 00936-8179

Irma López  
Director  
Compliance and Quality Control Directorate  
Puerto Rico Aqueduct and Sewer Authority  
P.O. Box 7066  
San Juan, Puerto Rico 00916-9990

Re: Reconnaissance Inspection within the Autonomous Municipality of San Juan (MSJ) and Puerto Rico Aqueduct and Sewer Authority (PRASA) Collection Systems.  
Autonomous Municipality of San Juan (MSJ) MS4 (PRR040036)  
Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Wastewater Treatment Plant Collection System (PR0021555)

Dear Mrs. Rosa and López:

This letter is in reference to the National Pollutant Discharge Elimination System ("NPDES") Reconnaissance Inspections ("RI") conducted by the United States Environmental Protection Agency's ("EPA") Region 2, Caribbean Environmental Protection Division on January 23, 2015. This report indicates that certain potential non-compliance items and/or areas of concern which must be corrected and/or investigated to ensure compliance with your respective NPDES Permits and/or the Clean Water Act.

Within forty five (45) days of receipt of this letter, respond to EPA-CEPD in writing with the actions that MSJ and PRASA has taken or will take to address the non-compliance items and other issues identified in the report. If the item has already been addressed also please note that in your response. However, if these items require extensive repairs and/or capital investments, then the work shall be scheduled in consideration of other priorities and the details shall also be informed to EPA.

Also send a copy of your response to Wanda E. García Hernández, Director, Water Quality Area, EQB, Puerto Rico Environmental Quality Board, P.O. Box 11488, Santurce, Puerto Rico 00910

If you have any questions please feel free to contact Alex O. Rivera of my staff at 787-977-5845.

Sincerely,



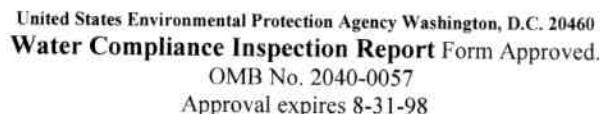
Chief

Municipal Water Program Branch

Caribbean Environmental Protection Division

Enclosure

cc: Wanda E. García Hernández, Director, Water Quality Area, PREQB  
Emma Blanco, PRASA Metro Region Compliance (electronically via email)  
William Díaz, PRASA Metro Region Compliance (electronically via email)  
Héctor Cepeda, PRASA Metro Region Compliance (electronically via email)  
Yanira Cosme, PRASA Metro Region Operations (electronically via email)  
Christie Mota, PRASA Metro Region San Juan Area Operations (electronically via email)  
Juan Pérez, PRASA (electronically via email)  
Alexander Avila, MSJ (electronically via email)  
Maylene Pérez, MSJ (electronically via email)



Transaction Code		NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type							
1	N	2		3	P	R	0	0	2	1	5	5	5	11	12	1	5	0	1	2	3	17					18-19R201	
															Remarks													
21	U	N	N	A	C	E	P	T	A	B	L	E																66
Inspection Work Days				Facility Self-Monitoring Evaluation Rating										B1		QA		Reserved										
67		1		69																								
				70										71		72		73747580										
				U																								

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time/Date Permit Effective Date 2:00 PM January 23, 2015	
PRASA Puerto Nuevo RWWTP Collection System (PR0021555) Santurce's Ribot Street Collection System		Exit Time/Date Permit Expiration Date 3:06 PM January 23, 2015	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  N/A		Other Facility Data - Other Responsible Officials	
Name, Address of Responsible Official/Title/Phone and Fax Number(s) Roberto Martínez Director PRASA Metro Region 939-292-6690		Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

	Permit		Flow Measurement	X	Operations & Maintenance CSO/SSO (Sewer Overflow)
	Records/Reports		Self-Monitoring Program		Sludge Handling/Disposal Pollution Prevention
	Facility Site Review		Compliance Schedules		Pretreatment Multimedia
	Effluent/Receiving Water		Laboratory		Storm Water

See Enclosed Report

See Enclosed Report

EPA Form 3560-3 (Rev 9-94) Previous editions are obsolete



**SUPPLEMENT TO WATER COMPLIANCE INSPECTION REPORT FORM  
(EPA FORM 3560-3 (REV 9-94))**

**SANTURCE'S RIBOT STREET STORM WATER AND WASTEWATER  
COLLECTION SYSTEMS**

Reconnaissance Inspection: Autonomous Municipality of San Juan (MSJ) Municipal Separate Storm Sewer System (MS4)  
National Pollutant Discharge Elimination System (NPDES) Permit (PRR040036)  
Puerto Rico Aqueduct and Sewer Authority ("PRASA") Puerto Nuevo Regional Wastewater Treatment Plant (RWWTP) NPDES Permit (PR0021555)

Location Address: Ribot Street, Santurce, Puerto Rico 00907  
Coordinates: Lat. 18° 27' 8.89" N – Long. 66° 4' 30.13" W

Inspection Date: January 23, 2015

Inspector: Alex O. Rivera, Environmental Engineer  
USEPA Region 2  
Caribbean Environmental Protection Division  
Municipal Water Program Branch  
(787) 977-5845

**I. Background and inspection purpose:**

On January 23, 2015, Alex O. Rivera of EPA Region 2 conducted a reconnaissance inspection ("RI") of the storm water and wastewater sewers located in Santurce's Ribot, Valencia, and Condado Streets in San Juan, Puerto Rico. The inspection was performed in response to a citizen complaint received on January 22, 2015 and related to wastewater discharges affecting Santurce's Ribot Street stormwater collection system and foul odors affecting the residents of the area. The complainant also alleged that the problem has been recurrent since the beginning of year 2014.

Ribot Street storm water collection system is part of MSJ's MS4 and its wastewater collection system is part of PRASA's Puerto Nuevo RWWTP collection system. MSJ nor PRASA were represented during the inspection. The inspection was performed pursuant to the authority in Section 308(a) of the CWA. The inspection took place from approximately 2:00 p.m. to 3:06 p.m., local time. Dry weather and clear skies prevailed during the inspection. All photos related to the items above were taken using a Nikon Coolpix P510 Digital Camera. Photos DSCN1696 to DSCN1727 were taken and included in Attachment I of this document.

**II. Inspection Findings and Observations:**

**A.** The findings and observations of the RI are included below:

1. A wastewater manhole located in front of Ribot Street's residence #1154 and in the corner of Valencia and Ribot Streets intersection (northeast side) was found surcharged.

See Attachment I photos DSCN1696 thru 1700 for more details. An approximately 4 inches PVC pipe was found connected to the upper part of the manhole, no discharge was observed, see photo DSCN1699 for more details.

2. The storm water collection system in the intersection of Valencia and Ribot Streets intersection was found without signs of wastewater presence nor flow.
3. A storm water collection system manhole located in front of Ribot Street residence #1154 was found with stagnant water and no flow. See photos DSCN1701 thru 1703 for more details.
4. A wastewater manhole located in the corner of Valencia and Ribot Streets and in front of Valencia #1115 (northwest side) was found surcharged and with solids accumulation. Signs of recent overflows were also observed in the street curb. See photos DSCN1704 thru 1706 for more details.
5. Two (2) manhole structures in Tizol and Ribot Streets intersection were found dry and full of solids and sand. The storm water catch basin located in the same intersection was found full of stagnant water. See photos DSCN1707 thru 1710 for more details.
6. A wastewater manhole located in front of Ribot Street #1107 was found with significant amount of solids and grease accumulated on its bottom and clogging its half pipe. See photos DSCN1711 and 1712 for more details.
7. A wastewater manhole located in Ribot and Soledad Streets intersection was found flowing slowly and with low levels. Its pipe coming from Ribot and Barcelona Streets intersection was found partially obstructed by solids. See photos DSCN1713 and 1714 for more details.
8. A wastewater manhole in front of Valencia Street #113 was found flowing slowly and with low levels. See photos DSCN1715 and 1716 for more details.
9. A wastewater manhole in front of Valencia Street #109 was found flowing slowly. Two (2) PVC pipes were observed connected directly into the wastewater manhole. See photos DSCN1717 and 1718 for more details.
10. A wastewater manhole located west side of Ribot and Condado Streets intersection was found with high levels and accumulation of solids and grease. One of the pipes entering the structure from the south side of the intersection was found partially obstructed. The pipe entering the structure from its west side was found obstructed. Significant amount of flow was observed flowing from the east side on the intersection. See photos DSCN1719 and 1720 for more details.
11. The storm water manhole located west side of the Ribot and Condado Streets intersection was found with traces of grease and wastewater characteristics (e.g. color, solids). See photo DSCN1721 for more details.
12. A wastewater manhole located at the east side of Condado and Ribot Streets intersection was found full of solids. See photos DSCN1722 and 1723 for more details.
13. A storm water manhole located at the northeast side of Condado and Ribot Streets intersection was found obstructed by solids. See photo DSCN1724 for more details.



14. A wastewater manhole located south of Condado and Ribot Streets intersection was found flowing slowly but with signs of recent high levels and heavy accumulation of solids in the sides of the structure bottom. See photos DSCN1726 and 1727 for more details.

### **III. Conclusion**

Wastewater is a pollutant as defined by Section 502(6) of the Clean Water Act (Act), 33 U.S.C. § 1362. The Atlantic Ocean and its tributaries are considered Waters of the United States as defined by the Act. Ribot Street MS4 and PRASA's Wastewater Collection Systems are point sources as defined by the Act. Ribot Street Storm Water Collection System is an appurtenance of the MSJ and is a point source as defined by the Act. Ribot Street Wastewater Collection System is an appurtenance of PRASA and is a point source as defined by the Act. The Ribot Street Wastewater Collection System discharge by gravity wastewater into MSJs MS4. MSJ and PRASA does not have an NPDES permit to discharge the pollutants (e.g. sewage, wastewater solids) that were observed in MSJ MS4.

MSJ and PRASA shall take the necessary actions to cease discharging wastewaters into Waters of the United States. The response to this report shall include all the details, evidence, and results of such actions.

Report prepared by:



Eng. Alex O. Rivera  
Environmental Engineer

Dated:

1/28/15

### **Attachment I – Photo Log and Location Map**



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1696:** Wastewater manhole located in front of Ribot Street's Residence #1154 and in the corner of Valencia and Ribot's Streets intersection (northeast side).



**DSCN1697:** The wastewater manhole located in front of Ribot Street #1154 described in photo DSCN1696 was found surcharged.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1698** – Additional view of the wastewater manhole located in front of Ribot Street #1154 described in photo DSCN1696 and 1697. The manhole was found surcharged.



**DSCN1699** - Additional view of the wastewater manhole located in front of Ribot Street #1154 described in photo DSCN1696 thru 1698. An approximately 4 inches PVC pipe was found connected to the upper part of the manhole, no discharge was observed.

**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1700** – Additional view of the surcharged wastewater manhole located in front of Ribot Street #1154 described in photo DSCN1696 thru 1699.



**DSCN1701** – View of Ribot Street residence #1154. The opened manhole in the photo is part of the storm water collection system.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1702** – View of Ribot and Valencia Streets intersection. The opened manhole in the photo is part of the storm water collection system and is located in front of Ribot Street's residence #1154.



**DSCN1703** – Partial view of storm water manhole located in front of Ribot Street residence #1154. It was found with stagnant water and no flow.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1704** – View of wastewater manhole located in the corner of Valencia and Ribot Streets and in front of Valencia #1115 (northwest side).



**DSCN1705** – The wastewater manhole located in the corner of Valencia and Ribot Streets and in front of Valencia #1115 (northwest side) was found surcharged and with solids accumulation. Signs of recent overflows were also observed in the street curb.

**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1706** – Another view of wastewater manhole located in the corner of Valencia and Ribot Streets and in front of Valencia #1115 (northwest side) was found surcharged and with solids accumulation. Signs of recent overflows were also observed in the street curb.



**DSCN1707** – View of Ribot and Tizol Streets intersection. Two (2) manhole structures in Tizol and Ribot Streets intersection were found dry and full of solids and sand. The storm water catch basin located in the same intersection was found full of stagnant water.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1708** – Partial view of a manhole structure located in Ribot and Tizol Streets intersection. The manhole was found full of sand.



**DSCN1709** – Partial view of an additional manhole structure located in Ribot and Tizol Streets intersection. The manhole was also found full of sand and solids.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1710** – Additional view of Ribot and Tizol Streets intersection. The opened manhole in the photo is the one showed and described in photo DSCN1709.



**DSCN1711** – View of wastewater manhole located in front of Ribot Street #1107. The manhole was found with significant amount of solids and grease accumulated on its bottom and clogging its half pipe.

**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1712** – View of wastewater manhole located in front of Ribot Street #1107 building and described in photo DSCN1711.



**DSCN1713** – View of wastewater manhole located in Ribot and Soledad Streets intersection.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1714** – A wastewater manhole located in Ribot and Soledad Streets intersection was found flowing slowly and with low levels. Its pipe coming from Ribot and Barcelona Streets intersection was found partially obstructed by solids.



**DSCN1715** – A wastewater manhole in front of Valencia Street #113 was found flowing slowly and with low levels.



**Attachment I: EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map**



**DSCN1716** – View of wastewater manhole located in front of Valencia Street #113.



**DSCN1717** – View of wastewater manhole in front of Valencia Street #109 was found flowing slowly. Two (2) PVC pipes were observed connected directly into the wastewater manhole.

**Attachment I: EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map**



**DSCN1718** – View of wastewater manhole located in front of Valencia Street #109 (Valencia Town House) and described in photo DSCN1717.



**DSCN1719** – View of wastewater manhole located west side of Ribot and Condado Streets intersection was found with high levels and accumulation of solids and grease. One of the pipes entering the structure from the south side of the intersection was found partially obstructed. The pipe entering the structure from its west side was found obstructed. Significant amount of flow was observed flowing from the east side on the intersection.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1720** – View of west side of Ribot and Condado Streets intersection.



**DSCN1721**– Partial view of stormwater manhole located west side of the Ribot and Condado Streets intersection was found with traces of grease and wastewater characteristics (e.g. color, solids).



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1722** – View of Ribot and Condado Streets intersection. Photo taken from east side looking to west side of the intersection. The opened manhole in the photo is described in photo DSCN1723 below.



**DSCN1723** – A wastewater manhole located at the east side of Condado and Ribot Streets intersection was found full of solids.

**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1724** – Partial view of storm water manhole located at the east side of Condado and Ribot Streets intersection was found obstructed by solids.



**DSCN1725** – View of northeast side of Ribot and Condado Streets intersection. The opened manhole in the photo is described in photo DSCN1724 above.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map



**DSCN1726** – Partial view of wastewater manhole located south of Condado and Ribot Streets intersection was found flowing slowly but with signs of recent high levels and heavy accumulation of solids in the sides of the structure bottom.



**DSCN1727** – View of south side of Ribot and Condado Streets intersection. The opened manhole in the photo is described in photo DSCN1726 above.



**Attachment I:** EPA January 23, 2015 Reconnaissance Inspection at Santurce's Ribot Street Storm Water and Wastewater Collection Systems - Photo Log and Location Map

